Interpretation Memo

Member Firm Regulation



Stock Exchange, Inc.
20 Broad Street

New York, NY 10005

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PLEASE ROUTE TO FINANCIAL AND OPERATIONS OFFICER/PARTNER AND COMPLIANCE AND MARGIN DEPARTMENTS

TO: MEMBERS, MEMBER ORGANIZATIONS AND HANDBOOK SUBSCRIBERS

SUBJECT: UPDATE OF INTERPRETATION HANDBOOK FOR SEC RULE 15C3-1

The SEC has recently released four no-action letters pertaining to the capital treatment of Fed Funds, Commercial Paper and negotiable Certificates of Deposit issued by Cayman Island branches of foreign banks. The accompanying updated handbook pages are being distributed as replacements for existing pages. As these interpretations have not been previously available, they should be carefully reviewed before insertion into the handbook.

Rule 15c3-1 Page & Reference	Subject
172 (c)(2)(iv)(C)/16	Federal Funds Sales & Swap Transactions
176 (c)(2)(iv)(E)/061	Certificates of Deposit Issued by Cayman Island branches of Foreign Banks
227 (c)(2)(vii)/06	Marketability of Commercial Paper
228 (c)(2)(vii)/07	Marketability of Commercial Paper Under Section 936 Market

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